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October 31, 2018

VIA ECF

Hon. Valerie Caproni
United States District Judge
Southern District of New York
40 Foley Square, Room 240
New York, New York 10007

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Re: *David A. Joffe v. King & Spalding LLP*
17 Civ. 3392 (VEC)(SDA)

Dear Judge Caproni:

This law firm represents Defendant King & Spalding LLP (“K&S”) in the above-referenced matter. We are writing in accordance with Your Honor’s Individual Practice 2(C) to request a brief extension of time to complete expert discovery in this case. The information required by Your Honor’s rules is as follows:

1. The reason for the proposed extension of time is that the parties have retained five expert witnesses collectively and require additional time to conduct depositions.
2. The original due date for the completion of expert discovery is November 23, 2018. (See Doc. 90.)
3. There have been no previous requests for an extension of this expert discovery period.
4. Plaintiff consents to this request.
5. The proposed alternative date for the close of expert discovery is November 27, 2018, which will accommodate the scheduling of the rebuttal expert discussed with the Court during the October 29, 2018 telephonic conference.

For the foregoing reasons, K&S respectfully requests an extension of time through November 27, 2018 to complete expert discovery.

Respectfully submitted,

PROSKAUER ROSE LLP

By: /s/ Joseph Baumgarten

Joseph Baumgarten
Pinchos Goldberg

Proskauer»

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cc: David Joffe, Esq. (via ECF)